

True copy \_\_\_\_\_

United States District Court

For the

District of Oregon

Portland Division

James E. Jacobson, Jr.

Plaintiff

-vs-

The State of Oregon; Tina Kotek in her  
capacity as the Governor of the State of  
Oregon and in her prior capacity as  
Speaker of the Oregon House of  
Representatives (group 1); and, AH  
Gresham Park, LLC, a foreign LLC,  
registered in Oregon as a Utah Company;  
AH Albion House, LLC, A domestic Utah  
Company; The Management Group, a  
Washington Company, and TMG Property  
Management Services NW, LLC, a foreign  
LLC, registered in Oregon as a Washington  
State Company, jointly and severally  
(group 2)

Defendant(s)

Case No. 3:23-CV-01551-HZ

PLAINTIFF'S MOTION FOR  
VOLUNTARY DISMISSAL


**PLAINTIFF'S MOTION FOR VOLUNTARY DISMISSAL**

Plaintiff, James E. Jacobson, Jr., hereby moves to voluntarily dismiss this action pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i).

Plaintiff requests that this dismissal be without prejudice.

Dated: May 6<sup>th</sup>, 2024

Respectfully submitted,

Signature of Plaintiff: /s/  \_\_\_\_\_

Printed Name of Plaintiff: James E. Jacobson, Jr.

### CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Oregon, that on 01/25/2023, I served a copy of **PLAINTIFF'S MOTION FOR VOLUNTARY DISMISSAL on all parties having appeared in this matter:**

■ By electronic means through CM/ECF to:

Anuradha Sawkar  
The State of Oregon  
Oregon Department of Justice  
1162 Court St. NE  
Salem, OR 97301  
Email: [anu.sawkar@doj.state.or.us](mailto:anu.sawkar@doj.state.or.us)

Brian Simmonds Marshall  
Oregon Department of Justice  
Trial Division, Special Litigation Unit  
100 SW Market Street  
Portland, OR 97201  
(971) 673-1880  
Email: [brian.s.marshall@doj.state.or.us](mailto:brian.s.marshall@doj.state.or.us)

Nicholas Beyer  
Heather C. Beasley  
Davis, Rothwell Earle & Xochichua, PC  
200 SW Market St, Suite 1800  
Portland, OR 97201-5745  
(503) 222-4422  
Email: [nbeyer@davisrothwell.com](mailto:nbeyer@davisrothwell.com)

Attorneys for: AH Albion House, LLC, AH Gresham Park, LLC, and TMG Property Management Services NW, LLC

Dated: 05/06/2024

  
/s/

Plaintiff  
James E. Jacobson, Jr.

---

Print Name